

STATE OF NEW JERSEY



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SUPERIOR COURT

) LAW DIVISION  
) UNION COUNTY  
) DOCKET # L-97231-88

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SOLVENTS RECOVERY SERVICE :  
NEW ENGLAND, INC., AND :  
SOLVENTS RECOVERY SERVICE OF :  
NEW JERSEY, :  
                    Plaintiffs, :  
                                  : :  
VS. :  
                                  : :  
EXCESS INSURANCE COMPANY, :  
HOME INSURANCE COMPANY, ET :  
AL, :  
                    Defendants. :  
-----X

DEPOSITION OF LOUIS A. FIONDELLA,  
TAKEN BEFORE LEE ANN BIANCUCCI, R.P.R., A NOTARY  
PUBLIC IN THE STATE OF CONNECTICUT, PURSUANT TO  
SUBPOENA, AT THE HOWARD JOHNSON MOTEL, ROUTE  
I-84 AND CONN. 10, SOUTHTON, CONNECTICUT, ON  
NOVEMBER 12, 1990, AT 10:00 A.M.

Lee Ann Biancucci, R.P.R.  
Brandon Reporting Service  
450 Main Street  
Hartford, CT 06103  
(203) 549-1850

1 else that was working there, it was -- you have to  
2 realize the town of Southington was no where near  
3 the size of what it is now, and most of the time  
4 after working with the town so long, people being  
5 raised here, you practically knew everybody that  
6 came in. If a stranger did come, you would ask  
7 where he was coming from because that was the big  
8 thing; they didn't want the landfill to fill up  
9 quicker by stuff coming from out of town; not what  
10 the material was.

11 Q Was there any procedure whereby a person or a  
12 company would have to sign a book or sign in before  
13 dumping their materials?

14 A No, never.

15 Q Was there ever such a procedure?

16 A No. No.

17 Q Not even up until the time the landfill closed?

18 A No.

19 Q Are you familiar with a company called Solvents  
20 Recovery on Lazy Lane in Southington, Connecticut?

21 A Yes.

22 Q Do you recall at any time when you were working at  
23 the landfill from 1962 up until its closing that  
24 materials were dumped by Solvents at that landfill?

25 A Materials were dumped. Let me tell you this. I

1 want to be very, very frank about this. I know why  
2 I am here. I don't want to put myself into a  
3 position to call anything anything because I am not  
4 a chemist. I don't even know what went in there.  
5 I, as a person, you could tell me one thing and  
6 tell me it was bad, I don't know what was good or  
7 what was bad. All I know is whatever came in, we  
8 had what they call separating areas for metals, for  
9 wood, general garbage, and we had an area where, if  
10 you want to call it Solvents or whatever, came out  
11 of the barrels. And what it was, we had a lagoon  
12 built to dump in that and several were built for  
13 these trucks to come in and dump. Now, at that  
14 time, Solvents did not have a truck of their own.

15 Q When you say "at that time," what year?

16 A When I was there, Solvents did not have a truck of  
17 their own. They hired people on and it was trucked  
18 in from them, plastic bags or barrels or whatever.  
19 I don't remember a truck saying "Solvents" on it.

20 Q Do you remember the name of the company that  
21 Solvents used to transport their materials?

22 A No. Vaguely in my mind, I remember an older fellow  
23 from Cheshire that used to come in and clean up for  
24 them, and he had an old truck and it was like a  
25 part-time job for him, and he used to be in there

1 and dump, and I know only through the caretaker  
2 that that's where it was coming from.

3 Q When you say --

4 A There was no writing on the side of the truck  
5 saying a name or what.

6 Q When you say Cheshire, what are you referring to?

7 A That's where he lived, the fellow that had worked  
8 for Solvents. -He was a guy from Cheshire, that's  
9 all.

10 Q Is that the name of a street or a road?

11 A The next town, Cheshire, that's where he lived. I  
12 never knew his name. He was an older guy that did  
13 that part time.

14 Q How do you spell that town's name?

15 A C-h-e-s-h-i-r-e.

16 Q Do you remember a company called Mastrianni  
17 Construction Company?

18 A Mastrianni, right.

19 Q Did you ever see them dump any materials at the  
20 landfill?

21 A I am sure they did, but you know why I say that,  
22 because they did work there on a part-time basis  
23 also, but to say that I definitely remember them  
24 coming in with their trucks and their kids ran the  
25 operation, not really, because I think he had like

1 a dumping spot of his own that he used to take.

2 Q Was there a particular spot at the landfill where  
3 material from Solvents Recovery would be placed in  
4 the landfill?

5 A Yes, along with many other companies, also, and  
6 people, too, that had anything like that.

7 Q When a company would come into the dump, would they  
8 be allowed to bring their trucks all the way up to  
9 the cell?

10 A Yes, right, it was separate. What it was, it was a  
11 lagoon. It was a big, giant hole dug and they kept  
12 throwing it in. Some of the stuff was like very  
13 liquidy and jelly-like matter. Whatever you would  
14 dump, it would slide down and slope to the bottom  
15 and build. It wasn't as though a pile would be  
16 left here. It would creep right down.

17 Q Who would dig those holes? Would it be the  
18 landfill people?

19 A Yes.

20 Q Would you know in advance when a company would be  
21 bringing their materials into the landfill?

22 A This hole was made. This hole I would say at that  
23 time was maybe 50 feet wide and maybe 100 feet long  
24 and 10, 12 feet deep and that would last for quite  
25 a while. I remember two in all the time that we

1 actually hit water.

2 Q How far down would you go before you hit water?

3 A Depended where you dug. If you dug at the north  
4 end, I would say 5 feet maybe, 6 feet, you would be  
5 in water. If you dug at the south end, the further  
6 point of the south end, you could be as deep as I  
7 would say 12, 15 feet and then you would hit water.

8 Q Did those water conditions which you have just  
9 described ever change during the course of 1962  
10 through 1967?

11 A What do you mean now by change? The conditions?

12 Q Were there times during that five-year period when  
13 the water levels which you have described 5 to 6  
14 feet or 12 to 15 feet would drop?

15 A Not -- no. No. Basically it would stay about the  
16 same level.

17 Q How far in relation to Black Pond was the cell or  
18 cells that were used by Solvents Recovery to  
19 dispose of their waste?

20 A If I could explain to you, the one cell was like --  
21 say the Quonset hut was close to the entrance gate,  
22 the roadway went to the front. The Quonset hut ran  
23 north and south and when you came into the gate,  
24 you were heading east, so you could have turned  
25 either north or south of the landfill and went and

1 dumped. The south end of the dump was basically,  
2 like I say, home garbage and refuse, whatever, from  
3 whatever they had at that time. And the north end  
4 was primarily brush, trees, home demolition, stuff  
5 like that, we would crush that up and cover it.

6 Then there was another spot where, like I say,  
7 heavy metals was separated, which was above the  
8 ground because if you got a pile big enough, you  
9 would haul that out of there. The tires were gone  
10 through and separated and once the tire guys that  
11 did come in there and checked the tires out -- it  
12 could have been anybody because they wanted tires  
13 out of there; it didn't make any difference who  
14 came and took them -- then you would have to bury  
15 them. You make a cell and try to bury them off in  
16 one cell because no matter where you put them with  
17 the garbage, it would always work its way up to  
18 the top. We would try to bury that and work from  
19 that point above, in our lower first cell, we would  
20 put that at the bottom and work our way up.

21 Q The tires always floated to the top?

22 A They kept moving. The best thing to do was put the  
23 most that you can in a cell and cover it and go  
24 over the top of it with garbage because that would  
25 hold them down.

1 Q The cell that Solvents used, would you say it was  
2 at the south part of the landfill?

3 A Getting back to that, ~~the cell that Solvents used~~  
4 ~~was closest to the road and it neared the main gate~~  
5 ~~entrance. That was the first cell that they had.~~  
6 That's the one I say was maybe 50 feet by 150 long.  
7 It ran north and south. The narrow part was east  
8 and west. It lasted quite a while. Like I say, it  
9 was there. It lasted a long time. ~~It was never~~  
10 ~~covered until the end.~~ Why I say that is because  
11 the hole was so deep, when they did dump, it  
12 wouldn't stay in the pile; ~~it would run out~~ and  
13 ~~flow out.~~ A lot of stuff was in plastic bags and  
14 barrels at the time or whatever, and whatever was  
15 dumped in there would slide and reach its own level  
16 all the time so that there was a barrier around it,  
17 so as it built up, ~~it would never leak out into the~~  
18 ~~road.~~ ~~It was an open pit actually all the time.~~

19 Q Would you be able to see ~~this cell that they~~  
20 ~~disposed of from the road if you passed the~~  
21 ~~landfill?~~

22 A Oh, yes, yes, because the fence was there and we  
23 were probably within 20 feet of the fence that we  
24 had dug it.

25 Q Was there a barrier itself around the hole that was



1        dug to accept the Solvents waste?

2        A    No, not really. It was -- what it was, the excess  
3        fill had been dumped around there. It was a little  
4        bit higher at different points, and all we did is  
5        steal from it to make the road better for them to  
6        back up at that point and keep throwing it in the  
7        same place.

8        Q    When this material came in, did it ever come in in  
9        a tank car where they would open up a valve and  
10       dispose of it, the material from Solvents?

11       A    Not that I know of. I don't remember that. It was  
12       ~~always open-bed trucks, lined in plastic bags and~~  
13       ~~barrels.~~ Not a tanker truck, no. Not in them  
14       days.

15       Q    Were these plastic bags tied up?

16       A    Yes.

17       Q    Was the material that was in the plastic bags  
18       liquid or a combination of liquid and solvent?

19       A    ~~When the truck dumped, you would see some liquid~~  
20       ~~come out, but the material that was in the bag was~~  
21       ~~more like a gray clay type matter.~~ I don't know  
22       how to explain it. Like a putty, a heavy putty,  
23       and it ~~had a very strong, like a lacquer smell to~~  
24       ~~it, that type of odor came out of it.~~

25       Q    Like a paint smell or thinner smell?

1 A Like a lacquer. I don't know if you are familiar  
2 with a lacquer smell but that type.

3 Q Would the material be disposed of by placing the  
4 plastic bag in the cell or would the bag be opened?

5 A Whatever it came in, it came out, it was dumped in  
6 there. The cell wasn't like lined or specially  
7 made. All it was was a big hole dug and whatever  
8 was dumped in there was dumped in there.

9 Q Was it dumped from the back end of the truck?

10 A Yes, and the people that came in there with  
11 barrels, they would have to unseal the top of the  
12 barrel, they would open the top and dump the  
13 barrels individually. There was smaller  
14 factories, they had their own little maintenance  
15 truck that came in there, and they would have six  
16 or eight barrels, the guy would back up and dump it  
17 in.

18 Q Were these barrels 55-gallon drums?

19 A All sizes. The majority of them were, I would say.  
20 If a truck brought them in with a couple of guys,  
21 they would have like 50-gallon drums. Sometimes  
22 the trucks were small, they would have 30-gallon  
23 drums. Sometimes the truck would take back barrels  
24 because everything was in something so they would  
25 take the same barrels back. They wouldn't throw it

1 away.

2 Q Did you ever complain to anyone about the smell  
3 that came from that cell where the materials such  
4 as the Solvents material was disposed of?

5 A Odor-wise? I was there, like I say, all them  
6 years, and even the other fellow, and when any  
7 material was dumped in there, believe me, it wasn't  
8 a continuous odor that it got stronger and heavier,  
9 whatever, because it was opened. The vapors went  
10 off. You didn't smell it that strong at no time.

11 Q It was only at the time it was disposed of there  
12 would be a strong smell?

13 A You know when you got the strong smell? Had you  
14 covered the cell and then went back to it after,  
15 then you would really get a blast of it. What it  
16 did is it built up fumes underneath. When they  
17 were released, you specifically noticed it. At the  
18 time when it was open, you didn't get anything that  
19 would be harmful because we had fellows that were  
20 pains and if after, if they hadn't done that, they  
21 would complain about it.

22 Q Did you ever receive any complaints from any  
23 neighbors about the landfill operations in general?

24 A In general?

25 Q From 1962 to 1967.

1 A Yes, one area which was the metal/wood area which  
2 was east of the landfill, people complained because  
3 at one time when the Town was looking to expand the  
4 landfill, it would be encroaching on their property  
5 and that is the only time there was any complaints  
6 about the landfill. Other than that, never, there  
7 was never any. They thought it was one of the  
8 greatest things going, there was no more burning,  
9 no more smoke. The people were satisfied. People  
10 lived in the back of the dump. When you were done  
11 in a day, everything was covered. You would drive  
12 by and you would never know it was a landfill.

13 Q The cell that accepted wastes such as Solvents  
14 waste was open?

15 A Yes.

16 Q Did that cell ever overflow from rain or anything  
17 like that?

18 A Did it overflow from rain? The one -- the first  
19 one on top of the hill never did. The one that was  
20 dug in back of the Quonset hut, which was the  
21 longer and deeper one, which had a water level of 5  
22 feet to begin with, at times it did.

23 Q Where would that overflow go to; in what direction  
24 would it go to?

25 A Towards the pond.

- 1 Q The Black Pond?
- 2 A Yes.
- 3 Q Was this because of the natural contour of the
- 4 landfill?
- 5 A Yes, exactly the way the land was.
- 6 Q Was that ever brought to anyone's attention?
- 7 A No, because, like I say, it wasn't a big, heavy
- 8 matter that come washing off. If you took water
- 9 and mixed oil with water right now, and you know
- 10 you would see the difference the way it came out,
- 11 it didn't grab any big bulk that you have to be
- 12 driving through any heavy, greasy stuff. It was
- 13 light matter. After the sun come out and it dried
- 14 out, it was gone, that was it.
- 15 Q That was a reference to the second cell that was
- 16 built to accept materials such as Solvents
- 17 material?
- 18 A Yes.
- 19 Q Did you ever --
- 20 A When you say Solvents material, it wasn't just
- 21 Solvents material. I am talking -- let's be
- 22 realistic. There were many other companies that
- 23 came in there and dumped.
- 24 Q I understand. Besides Solvents Recovery using the
- 25 landfill and using that particular cell or cells,

1       there were other companies that were disposing of  
2       waste?

3       A    Many.

4       Q    I am just referring now to the cells that Solvents  
5       was using along with the other companies.

6       A    Okay.

7       Q    The overflow was on the second cell that they used.

8       A    Right.

9       Q    Did they ever use any third cell or was the  
10      operation closed?

11      A    It was closed by then. We are talking back, it  
12      wasn't that big at the time.

13      Q    The first cell that accepted materials from  
14      companies such as Solvents Recovery, did there come  
15      a time when that cell was closed by you and other  
16      operators?

17      A    Only because it was filled up and that we moved and  
18      they covered over the top of it because we moved  
19      the area and it was encroaching on the same area  
20      that the garbage was being brought in on, and cells  
21      were creeping out to the roadway and then you would  
22      make another layer and go out. If the thing is  
23      down there, it's down there, like right now it  
24      would be kind of hard to say, but I would say that  
25      cell is covered now by 6 feet of garbage and

1 A You are saying from Solvents like a big truck  
2 coming in?

3 Q Yes.

4 A No. Or even the people that they had hired  
5 bringing in?

6 Q Yes.

7 A No, not that I'm aware of.

8 Q At the time, going back to the old landfill again  
9 and specifically referring to the two cells that  
10 you have marked on Exhibit 3, were there times when  
11 you would notice that the material that was being  
12 disposed of in those cells would ever bubble up?

13 MS. MARTIN: Objection as to the form  
14 of the question. There is no foundation as to any  
15 bubbling. It's a leading question.

16 A (Nodding negatively).

17 Q (By Mr. Calogero) Did you ever have an  
18 opportunity to go and look at the material that was  
19 being disposed of in those cells --

20 A And ~~stand by them while they were dumping it~~ off?

21 Q Right, after it was being disposed of.

22 A ~~Yes.~~

23 Q Would that material ~~break out of those bags?~~

24 A ~~Yes.~~ They were put in a 55-gallon drum. Some ~~were~~  
25 ~~broken.~~ Some stayed solid. It wasn't totally

1 A No, because it went -- only up to last year or the  
2 year before it was on a neighborhood basis that  
3 they had some meetings and the people felt as  
4 though they were directly involved with the bad  
5 water, contamination or whatever, and it was just  
6 apparently to them that they brought -- they  
7 brought a State representative in. That's the only  
8 thing I know of. I don't remember them having a  
9 meeting.

10 Q I have no further questions.

11  
12 CROSS EXAMINATION BY MR. NOLAN

13  
14 Q (By Mr. Nolan) Mr. Fiondella, my name is Jerry  
15 Nolan. We represent a Defendant in this matter. I  
16 have a couple of questions for you. You said  
17 earlier that Pratt & Whitney also dumped or  
18 disposed of some waste at the old landfill during  
19 the entire time it was open; is that correct?

20 A ~~Yes~~

21 Q Do you remember what years Solvents or between what  
22 years Solvents disposed of waste there?

23 A Between what years?

24 Q If you could approximate what years Solvents  
25 disposed of waste there as well.



1 A Like I say, as far as Solvents goes, Solvents never  
2 came in with a truck that said "Solvents." It was  
3 people that were hired by them that brought the  
4 stuff down. If you were aware and knew who the  
5 person was, fine. At that time, it wasn't our job  
6 to walk up to somebody and say, "Hey, what are you  
7 dumping? Where is it coming from?" If anybody  
8 told you that, they are full of baloney. That's  
9 the way it went. If it was a slowdown, you went  
10 over there and out of curiosity if the guy had a  
11 problem, he got something caught in his tailgate,  
12 you went over there and helped the guy out. If he  
13 got stuck, you went over there. ~~First of all,~~  
14 ~~everything was getting splashed around a lot.~~ It  
15 ~~was something you stayed away from.~~

16 Q Solvents didn't use their own trucks to dump the  
17 waste as you already stated; correct?

18 A Yes.

19 Q Because of the way in which they used other  
20 contractors, you are not exactly sure when they  
21 started to bring materials to the landfill; is that  
22 correct?

23 A Let me put it this way: Except for the two that  
24 they did have coming there, there was nobody else  
25 coming in there because the other factories that

1 did come there, you knew them. Like if it was a  
2 gas station bringing some stuff that was in a  
3 barrel, cleaning solution, or a guy that had a dry  
4 cleaners or any of the other places, you knew them.  
5 There was a name on the side of the vehicle. You  
6 knew who they were and after a while you knew that  
7 the trucks that did come in there, whether it be  
8 Mastrianni or this fellow from Cheshire, which I  
9 don't know his name but I can remember vividly the  
10 truck, and they were the only two I can remember  
11 that came from Solvents. Solvents didn't come in  
12 on a daily basis or as often as we will say like  
13 Pratt & Whitney. Pratt & Whitney had a schedule of  
14 coming in there.

15 Q Pratt & Whitney would come and dispose of their  
16 waste more regularly than Solvents?

17 A More regularly because they had more to dispose of  
18 as far as even skids and other materials. They  
19 came in there maybe twice a day, sometimes three  
20 times a day.

21 Q Would you be able to approximate for me if Pratt &  
22 Whitney disposed five times as much material as  
23 Solvents disposed of?

24 A As far as material overall?

25 Q Yes.

1 A Yes, definitely.

2 Q How about concerning the type of liquid waste that  
3 you discussed in your earlier testimony, do you  
4 know how much more of that Pratt & Whitney disposed  
5 of?

6 A It's hard to say because the truck that Pratt &  
7 Whitney came in in the beginning, like they used a  
8 different truck, it was about the same size, maybe  
9 they would come in a couple, three times a week,  
10 where the other guy, maybe like from Solvents, if  
11 they used we will say Mastrianni one time or the  
12 other guy another time, there would be like a long  
13 period of time before they would be in. Maybe once  
14 a month, once every six weeks. ~~Most of it that did~~  
15 ~~come in would be like from Pratt & Whitney.~~ They  
16 had barrels with plastic lined and zipped things on  
17 the top and the guy would throw it off. Until they  
18 went into the packer truck, they would crush it in  
19 there, bring it down and dump it out of the packer,  
20 which it was then like they were coming in on a  
21 less basis, they wouldn't be there as many days  
22 with that stuff. Maybe they would go two weeks and  
23 collect it all at one time and bring it and throw  
24 it in. Volume-wise, it would be a load.

25 Q To the best of your recollection, a contractor on

1       behalf of Solvents was depositing liquid waste  
2       there once every four weeks, once every six weeks?

3       A    There was no schedule if that's what you mean. Not  
4       like Pratt & Whitney. Pratt & Whitney I could  
5       almost time and say, "Hey, Pratt & Whitney is  
6       coming today with skids. They are coming in this  
7       afternoon with this, that," because you get to know  
8       the drivers. At the time, they had a schedule that  
9       they were on and that's what they did all the time.

10      Q    Once the dump became a landfill in 1962, what  
11      portion of the landfill did ~~Pratt & Whitney~~ deposit  
12      their liquid waste as you earlier described?

13      A    In ~~the lagoon~~. Sometimes they would throw skids in  
14      and it would be like a mixed load.

15      Q    Is it fair to say Pratt & Whitney disposed of their  
16      waste material, including the liquid material, in  
17      the same ~~cells Solvents~~ used?

18      A    Many times. It would be a mixed load. If it was a  
19      mixed load, ~~it went to the back north end corner~~  
20      where the wood and other debris was, like skids  
21      they used to get rid of. When I would go to push  
22      over the load and it would be like a barrel or  
23      something, you would hit it and it would go flying  
24      and stuff would be squirting out of it.

25      Q    Do you remember the names of any of the other

1 landfill?

2 A Yes.

3 Q You testified before that there were two  
4 contractors that transported Solvents waste to the  
5 landfill, Mastrianni Brothers and this unidentified  
6 gentleman from Cheshire?

7 A Yes. I don't know who that is. At different  
8 times, whoever I imagine at Solvents was able to  
9 get ahold of. I think the guy from Cheshire was  
10 cheaper. He would be there more often than  
11 Mastrianni ever was.

12 Q Were those the only two contractors that  
13 transported?

14 A That I was aware.

15 Q Do you know when they began transporting Solvents'  
16 waste to the landfill?

17 A Only when I was there, like after we started when  
18 we got our machine and we were actually working  
19 there, I would say after '63-- '62 and '63 that we  
20 were working there on a full-time basis.

21 Q From the time that you were working at the landfill  
22 until it closed, did the trips of bringing  
23 Solvents' waste to the landfill by either one of  
24 the contractors increase or decrease?

25 A It stayed about the same.

1 Q Can you recall if the Solvents waste was  
2 transported to the landfill right up until it  
3 closed in 1967?

4 A I am sure they all did.

5 Q Thank you. I have no further questions.  
6

7 CROSS EXAMINATION BY MS. MARTIN  
8

9 Q (By Ms. Martin) Just a couple of questions to make  
10 some clarifications. My name is Nancy Martin and I  
11 represent Solvents.

12 You have indicated just previously that the  
13 cells where waste from Solvents was deposited,  
14 Solvents had nothing to do with the digging of  
15 those cells?

16 A No. It was the Town's idea. It was already a  
17 style of creating a landfill and that's the way the  
18 systems were. This was taught to you by the State  
19 and they had their reasons for doing all these  
20 things.

21 Q Many other companies or industries from the area  
22 deposited their waste in the same cells where  
23 Solvents did; is that correct?

24 A Right.

25 Q Solvents, by depositing their wastes in these cells

1 were depositing their waste exactly where they were  
2 supposed to be depositing it; correct?

3 A Correct, because when they came in, they came in  
4 with a truck, either loose bags, plastic bags,  
5 heavier plastic bags that were put in the truck,  
6 the guy usually had a liner against the tailgate of  
7 the truck and if he wanted to dump them, he would  
8 back up to the hole and dump that in there. Other  
9 times, it was brought in, like in barrels which was  
10 hand-dumped out of the barrel and then the barrels  
11 were brought back to be refilled.

12 Q Solvents was not the only company or industry in  
13 the area that deposited liquid wastes in these two  
14 cells?

15 A No.

16 Q In fact, they were not the only company who  
17 deposited liquid waste in these cells that had a  
18 lacquer or paint type odor; is that correct?

19 A Right. They had only a portion of it.

20 Q That's all the questions I have. Thank you.

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22  
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REDIRECT EXAMINATION BY MR. CALOGERO

1 some of it towards the pond with an open trench.  
2 That's what they have now. Even right now, it  
3 doesn't relieve all the way. When it rains, the  
4 road floods down in that area. It's all blocked  
5 up. It doesn't leave too quick.

6 Q The person who disposed of the Solvents waste who  
7 you said was from the neighboring town of Cheshire,  
8 did he dispose of any other company's waste at the  
9 landfill?

10 A What the hell was the name of it? Yes. It was a  
11 plastics company. It was in Southington, then it  
12 moved to Cheshire. He worked for them, too.

13 Q Did that company dispose of their waste in the same  
14 cells as Solvents did?

15 A No. Theirs were more of plastic, Styrofoam type  
16 plastic and other plastic. The only ones that was  
17 a plastic related rubbery type substance was the  
18 factories.

19 Q When the individual from Cheshire came --

20 A It was all loose.

21 Q -- with a load that was going into Cells 1 and 2  
22 that you have marked on Exhibit 3, that was a load  
23 that came from Solvents?

24 A Yes.

25 Q The material that came from Solvents had a lacquer